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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**STIPULATION AND [PROPOSED]
ORDER AUTHORIZING RELEASE OF
APRIL 29 HEARING TRANSCRIPT**

Referral: Hon. Susan van Keulen, USMJ

1 WHEREAS, on April 23, 2021, the parties filed a Joint Discovery Statement Pursuant to
2 Dkt. 133, 133-1 re: Additional Discovery Disputes (Dkt. 140);

3 WHEREAS, on April 27, 2021, Google filed its Administrative Motion to Seal the
4 Courtroom for Hearing on Joint Discovery Statement (Dkt. 140), which was filed as Dkt. 142;

5 WHEREAS, on April 28, 2021, the Court granted Google's Administrative Motion to Seal
6 the Courtroom for Hearing on Joint Submission, and ordered that "[w]ithin 7 business days of
7 receipt of the transcript of the April 29 hearing, the parties must jointly submit proposed redactions
8 to the transcript." (Dkt. 143).

9 WHEREAS, the Court's website states that "[a] transcript [for under-seal proceedings]
10 cannot be generated without an order from the assigned judge"¹;

11 WHEREAS, the parties agree that the transcript, which contains material designated by
12 Google as "Confidential" or "Highly Confidential – Attorneys' Eyes Only," may be released to
13 counsel of record in this matter, who are authorized to view this material under the Stipulated
14 Protective Order as Modified by the Court (Dkt. 81);

15 NOW THEREFORE, IT IS HEREBY AGREED AND STIPULATED, subject to the
16 Court's approval, that the complete transcript of the April 29 hearing may be released to counsel of
17 record in this matter.

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¹ <https://www.cand.uscourts.gov/about/clerks-office/transcripts-court-reporters/>

Respectfully,

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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3 Date: _____, 2021

4 Hon. Susan van Keulen
United States Magistrate Judge

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Andrew H. Schapiro, attest that concurrence in the filing of this document has been obtained from the other signatories. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 30th day of April, 2021, at Chicago, Illinois.

/s/ Andrew H. Schapiro

Andrew H. Schapiro